

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

**RICHARD MAZUREK,
individually and on behalf of
all others similarly situated,**

Plaintiff,

v.

Case No. 17-cv-1439-WED

METALCRAFT OF MAYVILLE, INC.

Defendant.

JOINT STIPULATION TO AMEND SCHEDULING ORDER

Plaintiff Richard Mazurek (“Plaintiff”), individually and on behalf of all others similarly-situated, by his attorneys, Hawks Quindel, S.C., and Defendant Metalcraft of Mayville, Inc., by its attorneys, Jackson Lewis P.C. and Thomas P. Krukowski, S.C. (collectively “The Parties”), submit this Joint Stipulation to Amend Scheduling Order.

1. The Court held a Rule 16(b) scheduling conference on December 19, 2017, and entered a Scheduling Order. (ECF No. 14.) Since the entry of the Scheduling Order, the Parties have stipulated to conditional certification (ECF Nos. 15), the Court has granted that stipulation (ECF No. 16), notice was issued to putative class members on March 5, 2018, and the Parties analyzed data and engaged in settlement negotiations. Upon the Parties request and representation

that the Parties were going to engage in additional settlement discussions and mediation the Court issued an order amending the Scheduling Order (ECF No. 39).

2. Since then, settlement negotiations have not resulted in a resolution of this matter and Defendant have substituted counsel.

3. In light of Defendant's change in counsel, the Parties respectfully request the Court adjust the its Scheduling Order as follows:

- a. March 20, 2020 – Deadline for Plaintiff's motion for Rule 23 certification and Defendant's motion for decertification of the conditionally certified collective class;
- b. May 8, 2020 – Plaintiff shall disclose any expert witnesses in accordance with Civil L.R. 26(b) on or before this date;
- c. June 5, 2020 – Defendant shall disclose any expert witnesses in accordance with Civil L.R. 26(b) on or before this date;
- d. September 18, 2020 – all discovery shall be completed no later than this date;
- e. October 16, 2020 – all dispositive motions shall be served and filed no later than this date.

Dated this 3rd day of July 2019.

Respectfully submitted,

s/ Ronald S. Stadler

Thomas P. Krukowski, SBN
tkrukowski@tpklegal.com

Thomas P. Krukowski, S.C.
116 Legend Way

Respectfully Submitted,

s/ Larry A. Johnson

Larry A. Johnson, SBN 1056619
ljohnson@hq-law.com
Summer H. Murshid, SBN 1075404
smurshid@hq-law.com
Timothy P. Maynard, SBN 1080953

Wales, WI 53183
(414) 881-4210 (office)

Ronald S. Stadler, SBN 1017450
Ronald.stadler@jacksonlewis.com
Jonathan E. Sacks, SBN 1103204
Jonathan.sacks@jacksonlewis.com

Jackson Lewis, P.C.
330 E. Kilbourn Ave. Suite 560
Milwaukee, WI 53202
(414) 944-8900 (office)
(414) 944-8901 (facsimile)

Attorney for Defendant

tmaynard@hq-law.com

Hawks Quindel, S.C.
222 E Erie Street
Suite 210
P.O. Box 442
Milwaukee, WI 53202
(414) 271-8650 (office)
(414) 271-8442 (facsimile)

Attorneys for Plaintiffs